

Last revised: August 1, 2017

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In Re:
Martin R. & Christa N. Taylor

Case No.: 17-24222
Judge: ABA

Debtor(s)

Chapter 13 Plan and Motions

☐ Original ☒ Modified/Notice Required Date: April 13, 2018
☐ Motions Included ☐ Modified/No Notice Required

THE DEBTOR HAS FILED FOR RELIEF UNDER
CHAPTER 13 OF THE BANKRUPTCY CODE

YOUR RIGHTS MAY BE AFFECTED

You should have received from the court a separate *Notice of the Hearing on Confirmation of Plan*, which contains the date of the confirmation hearing on the Plan proposed by the Debtor. This document is the actual Plan proposed by the Debtor to adjust debts. You should read these papers carefully and discuss them with your attorney. Anyone who wishes to oppose any provision of this Plan or any motion included in it must file a written objection within the time frame stated in the *Notice*. Your rights may be affected by this plan. Your claim may be reduced, modified, or eliminated. This Plan may be confirmed and become binding, and included motions may be granted without further notice or hearing, unless written objection is filed before the deadline stated in the Notice. The Court may confirm this plan, if there are no timely filed objections, without further notice. See Bankruptcy Rule 3015. If this plan includes motions to avoid or modify a lien, the lien avoidance or modification may take place solely within the chapter 13 confirmation process. The plan confirmation order alone will avoid or modify the lien. The debtor need not file a separate motion or adversary proceeding to avoid or modify a lien based on value of the collateral or to reduce the interest rate. An affected lien creditor who wishes to contest said treatment must file a timely objection and appear at the confirmation hearing to prosecute same.

THIS PLAN:

☐ DOES ☒ DOES NOT CONTAIN NON-STANDARD PROVISIONS. NON-STANDARD PROVISIONS MUST ALSO BE SET FORTH IN PART 10.

☐ DOES ☒ DOES NOT LIMIT THE AMOUNT OF A SECURED CLAIM BASED SOLELY ON VALUE OF COLLATERAL, WHICH MAY RESULT IN A PARTIAL PAYMENT OR NO PAYMENT AT ALL TO THE SECURED CREDITOR. SEE MOTIONS SET FORTH IN PART 7, IF ANY.

☐ DOES ☒ DOES NOT AVOID A JUDICIAL LIEN OR NONPOSSESSORY, NONPURCHASE-MONEY SECURITY INTEREST. SEE MOTIONS SET FORTH IN PART 7, IF ANY.

Initial Debtor(s)' Attorney: RSB

Initial Debtor: MRT

Initial Co-Debtor: CNT

Part 1: Payment and Length of Plan

a. The debtor shall pay \$ 650.00 per month to the Chapter 13 Trustee, starting on May 1, 2018 for approximately 53 remaining months.

b. The debtor shall make plan payments to the Trustee from the following sources:

☒ Future earnings

☐ Other sources of funding (describe source, amount and date when funds are available):

c. Use of real property to satisfy plan obligations:

☐ Sale of real property

Description:

Proposed date for completion: _____

☐ Refinance of real property:

Description:

Proposed date for completion: _____

☐ Loan modification with respect to mortgage encumbering property:

Description:

Proposed date for completion: _____

d. ☐ The regular monthly mortgage payment will continue pending the sale, refinance or loan modification.

e. ☐ Other information that may be important relating to the payment and length of plan:

Part 2: Adequate Protection ☒ NONE

a. Adequate protection payments will be made in the amount of \$ _____ to be paid to the Chapter 13 Trustee and disbursed pre-confirmation to _____ (creditor).

b. Adequate protection payments will be made in the amount of \$ _____ to be paid directly by the debtor(s) outside the Plan, pre-confirmation to: _____ (creditor).

Part 3: Priority Claims (Including Administrative Expenses)

a. All allowed priority claims will be paid in full unless the creditor agrees otherwise:

Creditor	Type of Priority	Amount to be Paid
CHAPTER 13 STANDING TRUSTEE	ADMINISTRATIVE	AS ALLOWED BY STATUTE
ATTORNEY FEE BALANCE	ADMINISTRATIVE	BALANCE DUE: \$ 3,210.00
DOMESTIC SUPPORT OBLIGATION		
Winslow Township Municipal Court	Fines	\$1,233.00

b. Domestic Support Obligations assigned or owed to a governmental unit and paid less than full amount:
Check one:

☒ None

☐ The allowed priority claims listed below are based on a domestic support obligation that has been assigned to or is owed to a governmental unit and will be paid less than the full amount of the claim pursuant to 11 U.S.C.1322(a)(4):

Creditor	Type of Priority	Claim Amount	Amount to be Paid
	Domestic Support Obligations assigned or owed to a governmental unit and paid less than full amount.		

Part 4: Secured Claims

a. Curing Default and Maintaining Payments on Principal Residence: ☐ NONE

The Debtor will pay to the Trustee (as part of the Plan) allowed claims for arrearages on monthly obligations and the debtor shall pay directly to the creditor (outside the Plan) monthly obligations due after the bankruptcy filing as follows:

Creditor	Collateral or Type of Debt	Arrearage	Interest Rate on Arrearage	Amount to be Paid to Creditor (In Plan)	Regular Monthly Payment (Outside Plan)
Ditech Financial	Residence	\$32,558.08	0%	\$32,558.08	\$1,587.00

b. Curing and Maintaining Payments on Non-Principal Residence & other loans or rent arrears: ☒ NONE

The Debtor will pay to the Trustee (as part of the Plan) allowed claims for arrearages on monthly obligations and the debtor will pay directly to the creditor (outside the Plan) monthly obligations due after the bankruptcy filing as follows:

Creditor	Collateral or Type of Debt	Arrearage	Interest Rate on Arrearage	Amount to be Paid to Creditor (In Plan)	Regular Monthly Payment (Outside Plan)

c. Secured claims excluded from 11 U.S.C. 506: ☒ NONE

The following claims were either incurred within 910 days before the petition date and are secured by a purchase money security interest in a motor vehicle acquired for the personal use of the debtor(s), or incurred within one year of the petition date and secured by a purchase money security interest in any other thing of value:

Name of Creditor	Collateral	Interest Rate	Amount of Claim	Total to be Paid through the Plan Including Interest Calculation

d. Requests for valuation of security, Cram-down, Strip Off & Interest Rate Adjustments ☒ NONE

1.) The debtor values collateral as indicated below. If the claim may be modified under Section 1322(b)(2), the secured creditor shall be paid the amount listed as the "Value of the Creditor Interest in Collateral," plus interest as stated. The portion of any allowed claim that exceeds that value shall be treated as an unsecured claim. If a secured claim is identified as having "NO VALUE" it shall be treated as an unsecured claim.

NOTE: A modification under this Section ALSO REQUIRES the appropriate motion to be filed under Section 7 of the Plan.

Creditor	Collateral	Scheduled Debt	Total Collateral Value	Superior Liens	Value of Creditor Interest in Collateral	Annual Interest Rate	Total Amount to be Paid

2.) Where the Debtor retains collateral and completes the Plan, payment of the full amount of the allowed secured claim shall discharge the corresponding lien.

e. Surrender ☐ NONE

Upon confirmation, the stay is terminated as to surrendered collateral only under 11 U.S.C. 362(a) and that the stay under 11 U.S.C 1301 be terminated in all respects. The Debtor surrenders the following collateral:

Creditor	Collateral to be Surrendered	Value of Surrendered Collateral	Remaining Unsecured Debt
M&T Bank	38' Dutchman Trailer	\$1,000.00	\$13,313.90

f. Secured Claims Unaffected by the Plan ☒ NONE

The following secured claims are unaffected by the Plan:

g. Secured Claims to be Paid in Full Through the Plan: <input checked="" type="checkbox"/> NONE		
Creditor	Collateral	Total Amount to be Paid Through the Plan

Part 5: Unsecured Claims ☐ NONE

a. Not separately classified allowed non-priority unsecured claims shall be paid:

- ☐ Not less than \$ _____ to be distributed *pro rata*
☐ Not less than _____ percent
☒ *Pro Rata* distribution from any remaining funds

b. Separately classified unsecured claims shall be treated as follows:

Creditor	Basis for Separate Classification	Treatment	Amount to be Paid

Part 6: Executory Contracts and Unexpired Leases ☒ NONE

(NOTE: See time limitations set forth in 11 U.S.C. 365(d)(4) that may prevent assumption of non-residential real property leases in this Plan.)

All executory contracts and unexpired leases, not previously rejected by operation of law, are rejected, except the following, which are assumed:

Creditor	Arrears to be Cured in Plan	Nature of Contract or Lease	Treatment by Debtor	Post-Petition Payment

Part 7: Motions ☒ NONE

NOTE: All plans containing motions must be served on all potentially affected creditors, together with local form, *Notice of Chapter 13 Plan Transmittal*, within the time and in the manner set forth in D.N.J. LBR 3015-1. A *Certification of Service, Notice of Chapter 13 Plan Transmittal and valuation* must be filed with the Clerk of Court when the plan and transmittal notice are served.

a. Motion to Avoid Liens Under 11. U.S.C. Section 522(f). ☐ NONE

The Debtor moves to avoid the following liens that impair exemptions:

Creditor	Nature of Collateral	Type of Lien	Amount of Lien	Value of Collateral	Amount of Claimed Exemption	Sum of All Other Liens Against the Property	Amount of Lien to be Avoided

b. Motion to Avoid Liens and Reclassify Claim from Secured to Completely Unsecured. ☐ NONE

The Debtor moves to reclassify the following claims as unsecured and to void liens on collateral consistent with Part 4 above:

Creditor	Collateral	Scheduled Debt	Total Collateral Value	Superior Liens	Value of Creditor's Interest in Collateral	Total Amount of Lien to be Reclassified

c. Motion to Partially Void Liens and Reclassify Underlying Claims as Partially Secured and Partially Unsecured. ☐ NONE

The Debtor moves to reclassify the following claims as partially secured and partially unsecured, and to void liens on collateral consistent with Part 4 above:

Creditor	Collateral	Scheduled Debt	Total Collateral Value	Amount to be Deemed Secured	Amount to be Reclassified as Unsecured

Part 8: Other Plan Provisions

a. Vesting of Property of the Estate

- ☐ Upon confirmation
☒ Upon discharge

b. Payment Notices

Creditors and Lessors provided for in Parts 4, 6 or 7 may continue to mail customary notices or coupons to the Debtor notwithstanding the automatic stay.

c. Order of Distribution

The Standing Trustee shall pay allowed claims in the following order:

- 1) Ch. 13 Standing Trustee commissions
- 2) Administrative Expenses
- 3) Priority Claims
- 4) Unsecured Claims

d. Post-Petition Claims

The Standing Trustee ☐ is, ☒ is not authorized to pay post-petition claims filed pursuant to 11 U.S.C. Section 1305(a) in the amount filed by the post-petition claimant.

Part 9: Modification ☐ NONE

If this Plan modifies a Plan previously filed in this case, complete the information below.

Date of Plan being modified: July 13, 2017.

Explain below **why** the plan is being modified:

Reflect the total pre and post-petition mortgage arrears being paid through Debtors' Plan.

Explain below **how** the plan is being modified:

Part 1(a) - increase Debtors' monthly Trustee payments to \$650.00 for the remaining 53 months of Debtors' Plan.
Part 4(a) - reflect total amount of pre and post-petition arrears to be paid to Ditech Financial through Debtors' Plan.

Are Schedules I and J being filed simultaneously with this Modified Plan? ☐ Yes ☒ No

Part 10: Non-Standard Provision(s): Signatures Required

Non-Standard Provisions Requiring Separate Signatures:

☒ NONE

☐ Explain here:

Any non-standard provisions placed elsewhere in this plan are void.

The Debtor(s) and the attorney for the Debtor(s), if any, must sign this Certification.

I certify under penalty of perjury that the plan contains no non-standard provisions other than those set forth in this final paragraph.

Date: April 13, 2018

/s/ Richard S. Hoffman, Jr.
Attorney for the Debtor

Date: April 13, 2018

/s/ Martin R. Taylor
Debtor

Date: April 13, 2018

/s/ Christa N. Taylor
Joint Debtor

Signatures

The Debtor(s) and the attorney for the Debtor(s), if any, must sign this Plan.

Date: April 13, 2018

/s/ Richard S. Hoffman, Jr.
Attorney for the Debtor

I certify under penalty of perjury that the above is true.

Date: April 13, 2018

/s/ Martin R. Taylor
Debtor

Date: April 13, 2018

/s/ Christa N. Taylor
Joint Debtor

Certificate of Notice Page 11 of 12
 United States Bankruptcy Court
 District of New Jersey

In re:
 Martin R. Taylor
 Christa N. Taylor
 Debtors

Case No. 17-24222-ABA
 Chapter 13

CERTIFICATE OF NOTICE

District/off: 0312-1

User: admin
 Form ID: pdf901

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 Total Noticed: 45

Date Rcvd: Apr 16, 2018

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Apr 18, 2018.

db/jdb
 cr
 516938530 +Martin R. Taylor, Christa N. Taylor, 413 Deptford Road, Glassboro, NJ 08028-2412
 517136419 +Township of Winslow, c/o Platt & Riso, P.C., 40 Berlin Road, Stratford, NJ 08084-1404
 516938532 +Advocare Woodbury Pediatrics, PO Box 3001, Voorhees, NJ 08043-0598
 516938533 +Apex Asset Management, LLC, Virtua Health System - WJ, PO Box 5407,
 Lancaster, PA 17606-5407
 516938534 Apex Asset Mgmt., 2501 Oregon Pike, Suite 102, Lancaster, PA 17601-4890
 517158113 Atlantic Emergency Assoc., 6880 W. Snowville Road #210, Brecksville, OH 44141-3255
 516938539 +Atlanticare Regional Med Ctr-City Campus, 1925 Pacific Avenue, Atlantic City, NJ 08401-6713
 517151237 CACH, LLC its successors and assigns as assignee, of Citibank (South Dakota), N.A.,
 Resurgent Capital Services, PO Box 10587, Greenville, SC 29603-0587
 516938541 E-ZPass, NJ Customer Service Center, PO Box 4793, Trenton, NJ 08650
 516938542 Emergency Care Services of NJ, P.A., PO Box 1123, Minneapolis MN 55440-1123
 516938543 +Financial Recoveries, PO Box 1388, Mount Laurel, NJ 08054-7388
 516938544 +Inspira Health Network, 509 N. Broad Street, Woodbury, NJ 08096-1617
 516938545 +Kennedy Health System, 500 Marlboro Avenue, Cherry Hill, NJ 08002-2020
 516938546 +Kennedy Health Systems, PO Box 48023, Newark, NJ 07101-4823
 517044410 LDC Collection Systems, PO Box 4775, Trenton, NJ 08650-4775
 516938547 +Lyons Doughty & Veldhuis, PO Box 1269, Mount Laurel, NJ 08054-7269
 517085562 +M&T Bank, PO Box 1508, Buffalo, N.Y. 14240-1508
 516994615 M&T Bank, Attn: American Coradius Int'l, LLC, 2420 Sweet Home Road, Suite 150,
 Buffalo, NY 14228-2244
 516980695 +NJSVS, Surcharge Violation System Office, Bankruptcy Unit, PO Box 4850,
 Trenton, NJ 08650-4850
 517164112 +New Jersey Turnpike Authority, Mark Schneider, Esq, 581 Main Street, PO box 5042,
 Woodbridge, NJ 07095-5042
 516938548 New Penn Financial LLC, d/b/a Shellpoint Mortgage Servicing, KML Law Group PC,
 Sentry Office Plaza, 216 Haddon Avenue, Suite 206, Westmont, NJ 08108
 516938549 New Penn Financial, LLC, d/b/a Shellpoint Mortgage Servicing, PO BOX 10826,
 GREENVILLE SC 29603-0826
 516938550 +Omnia Diagnostics, 1 Duncan Drive, Cranbury, NJ 08512-3643
 516938551 Patient Financial Services, 30 Washington Avenue, Suite C6, Haddonfield, NJ 08033-3341
 516938552 +Penn Credit Corporation, PO Box 1259, Oaks, PA 19456-1259
 516938553 +Phelan Hallinan Diamond & Jones PC, 400 Fellowship Road, Suite 100,
 Mount Laurel, NJ 08054-3437
 516938554 Plymouth Rock Assurance Corp., PO Box 55933, Boston, MA 02205-5933
 516938555 Quest Diagnostics, PO Box 740775, Cincinnati, OH 45274-0775
 516938556 RowanSOM, Faculty Practice Plan, PO Box 635, Bellmawr, NJ 08099-0635
 516938557 State of NJ-AISC, PO Box 4775, Trenton, NJ 08650-4775
 516938558 +State of New Jersey, Motor Vehicle Commission, 225 E. State Street,
 Trenton, NJ 08666-0001
 516938559 +TD Bank USA/Target Credit Card, PO Box 673, Minneapolis, MN 55440-0673
 517015623 THD/CBNA, PO Box 6497, Sioux Falls, SD 57117-6497
 516938560 +Township of Winslow, c/o Platt & Riso, P.C., 40 Berlin Road,
 Stratford, New Jersey 08084-1404
 +Winslow Township Municipal Court, 125 South Route 73, Braddock, NJ 08037-9422

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.
 smg

E-mail/Text: usanj.njbankr@usdoj.gov Apr 16 2018 23:11:04 U.S. Attorney, 970 Broad St.,
 Room 502, Rodino Federal Bldg., Newark, NJ 07102-2534
 smg +E-mail/Text: ustpreregion03.ne.ecf@usdoj.gov Apr 16 2018 23:11:02 United States Trustee,
 Office of the United States Trustee, 1085 Raymond Blvd., One Newark Center, Suite 2100,
 Newark, NJ 07102-5235
 516938531 +E-mail/Text: roy.buchholz@allianceoneinc.com Apr 16 2018 23:10:24
 AllianceOne Receivables Mgt., 4850 Street Road, Suite 300, Trevose, PA 19053-6643
 516938535 E-mail/PDF: resurgentbknofications@resurgent.com Apr 16 2018 23:19:32 CACH, LLC,
 4340 S. Monaco St., Second Floor, Denver, CO 80237-3485
 516938537 +E-mail/Text: bankruptcy_notifications@ccsusa.com Apr 16 2018 23:11:47
 Credit Collection Services, 725 Canton Street, Norwood, MA 02062-2679
 516938536 +E-mail/Text: bankruptcy_notifications@ccsusa.com Apr 16 2018 23:11:47
 Credit Collection Services, PO Box 607, Norwood, MA 02062-0607
 516938538 E-mail/Text: bankruptcy.bnc@ditech.com Apr 16 2018 23:10:49 Ditech Financial, LLC,
 Bankruptcy Department, PO Box 6154, Rapid City, SD 57709-6154
 516938554 +E-mail/Text: bkrpt@retrievalmasters.com Apr 16 2018 23:11:01 RMCB Collection Agency,
 4 Westchester Plaza, Suite 110, Elmsford, NY 10523-3835
 517163066 +E-mail/Text: bncmail@w-legal.com Apr 16 2018 23:11:14 TD Bank USA, N.A.,
 C O WEINSTEIN & RILEY, PS, 2001 WESTERN AVENUE, STE 400, SEATTLE, WA 98121-3132
 517070324 +E-mail/PDF: EBN_AIS@AMERICANINFOSOURCE.COM Apr 16 2018 23:19:57 Verizon,
 by American InfoSource LP as agent, 4515 N Santa Fe Ave, Oklahoma City, OK 73118-7901
 TOTAL: 10

District/off: 0312-1

User: admin
Form ID: pdf901

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Total Noticed: 45

Date Rcvd: Apr 16, 2018

***** BYPASSED RECIPIENTS (continued) *****

***** BYPASSED RECIPIENTS (undeliverable, * duplicate) *****

516938540 ##+Federated Law Group, PLLC, 13205 U.S. Highway 1 #555, Juno Beach, FL 33408-2253
TOTALS: 0, * 0, ## 1

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP.
USPS regulations require that automation-compatible mail display the correct ZIP.

Transmission times for electronic delivery are Eastern Time zone.

Addresses marked '##' were identified by the USPS National Change of Address system as undeliverable. Notices will no longer be delivered by the USPS to these addresses; therefore, they have been bypassed. The debtor's attorney or pro se debtor was advised that the specified notice was undeliverable.

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Apr 18, 2018

Signature: /s/Joseph Speetjens

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on April 13, 2018 at the address(es) listed below:

Andrew M. Lubin on behalf of Creditor New Penn Financial LLC d/b/a Shellpoint Mortgage
Servicing bkecf@milsteadlaw.com, alubin@milsteadlaw.com
CherylLynn Walters on behalf of Creditor Township of Winslow cwalters@prlawoffice.com
Denise E. Carlson on behalf of Creditor New Penn Financial LLC d/b/a Shellpoint Mortgage
Servicing dcarlon@kmlawgroup.com, bkgroup@kmlawgroup.com
Isabel C. Balboa ecfmail@standingtrustee.com, summarymail@standingtrustee.com
Richard S. Hoffman, Jr. on behalf of Debtor Martin R. Taylor rshoffman@hoffmandimuzio.com,
lmcevoy@hoffmandimuzio.com; jslachetka@hoffmandimuzio.com
Richard S. Hoffman, Jr. on behalf of Joint Debtor Christa N. Taylor
rshoffman@hoffmandimuzio.com, lmcevoy@hoffmandimuzio.com; jslachetka@hoffmandimuzio.com
U.S. Trustee USTPRegion03.NE.ECF@usdoj.gov

TOTAL: 7